# United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
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IN REPLY REFER TO:

L7617 (PWRO-PP)

01 SEP 2015

Memorandum

To: Superintendent, North Cascades National Park Service Complex

From: Acting Regional Director, Pacific West Region

Subject: Environmental Compliance for Replacement of the Administrative Facilities at Stehekin, Lake Chelan National Recreation Area

The *Finding of No Significant Impact* for this infrastructure replacement and safety enhancement project is approved. Subsequently, to complete this particular environmental compliance effort, the park should provide for timely notice of the decision to all individuals and organizations that received or consulted on the supporting environmental assessment.

Congratulations to all park staff engaged in completion of plans for this much-anticipated step forward in implementing the 1995 General Management Plan.

Martha J. Lee

Attachment

# Finding of No Significant Impact

Replacement of Administrative Facilities at Stehekin Environmental Assessment
National Park Service, U.S. Department of the Interior
North Cascades National Park Service Complex
Lake Chelan National Recreation Area

August 2015

## INTRODUCTION

This Finding of No Significant Impact (FONSI) has been prepared in accordance with the National Environmental Protection Act (NEPA) for the *Replacement of Administrative Facilities at Stehekin Environmental Assessment* (November 2014) in Lake Chelan National Recreation Area (NRA). This document describes the selected action and provides an explanation of why it will have no significant impacts on the environment. The FONSI, along with the environmental assessment (EA) and the errata prepared for the project, constitutes a complete record of the environment impact analysis process for this proposal.

Lake Chelan NRA proposed a project to remove solid waste collection, employee housing, and maintenance activities from their regulatory floodplains. The new facilities will be located outside of the Stehekin River Channel Migration Zone (CMZ) in accordance with previous planning documents (e.g., 1995 General Management Plan [GMP]) and will provide necessary housing and facilities for efficient park management. Three action alternatives were evaluated in the EA. Based on the results of the assessments, one alternative has been selected (the Selected Alternative) for construction.

The National Park Service (NPS) is currently out of compliance with federal regulations regarding the management of solid waste. To address this issue, the NPS is promulgating a special regulation that would authorize collection and processing of solid waste generated by non-NPS activities in either the existing or a new/relocated transfer station. Once this rule goes into effect, the NPS will implement a new fee structure to charge non-NPS users for handling solid waste at the existing or a new/relocated transfer station. The new fee structure is part of all alternatives evaluated in the EA.

## PURPOSE AND NEED

The purpose of the proposed action within Lake Chelan NRA is to provide essential, cost-effective, and sustainable facilities for maintenance, fire operations, solid waste management, and staff housing outside of environmentally sensitive areas, including areas subject to flooding and in areas at lower risk for geohazards.

This action is needed because:

- Existing park facilities are located within the Stehekin River's CMZ, as well as its 100- and 500-year regulatory floodplains. NPS facilities in the floodplain not only experience flood-related damage, but also adversely affect the natural characteristics of the floodplain, including the CMZ. Additionally, current storage of solid waste and hazardous materials within the 500-year floodplain and location of aging septic systems within the 100-year floodplain threaten public health and safety and natural resources. The park must comply with Executive Order 11988 (Floodplain Management) (42 FR [Federal Register] 26951, 3 CFR [Code of Federal Regulations]), which "requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains, and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative" (Federal Emergency Management Agency [FEMA] n.d.).

- Existing solid waste facilities and park maintenance facilities are inefficient to operate. The compaction equipment, which is nearly two decades old, is undersized to handle the current waste stream and requires labor-intensive processing and material-intensive packaging. The existing maintenance facility buildings also lack adequate insulation and have single-pane windows. Other operational inefficiencies include outdated heating systems in the office, maintenance shop, and carpenter shop and no heating in the solid waste facility and warehouse. The carpenter shop has no restroom facilities and is located in a residential outbuilding over one-quarter mile away from the rest of the maintenance complex, resulting in lost production time. The warehouse has little insulation and cannot be used to store materials sensitive to freezing or summer temperatures. The disassociated locations of the maintenance buildings result in inefficiencies due to increased travel time, vehicle cost, and productivity, especially during the winter months when snow removal is required.
- The existing single-family employee housing unit and adjacent structures on Company Creek Road are in poor condition. Housing evaluations completed in the early 1990s recommended that this unit be discontinued as permanent housing because it was poorly constructed, has other deficiencies, and is located within the Stehekin River CMZ and floodplain. These structures have all been subjected to flooding, resulting in a safety hazard and forcing employees to be temporarily relocated during flood events.
- The location and design of the existing fire facility (Hilton) does not meet operational needs. The Hilton is a dorm-style crew bunkhouse with daylight basement apartment and attached garage. The Hilton was used by the US Forest Service to house seasonal employees and as a shop / equipment storage area. When the NPS acquired the facility, it was also used for seasonal housing and equipment storage. It wasn't until 1995 with the implementation of the Forest Fuel Reduction Program that the facility was reserved for use by the Fire Crew. The limited number of beds (4) at the Hilton does not provide sufficient capacity for seasonal fire park employees. The location of the Hilton at the Stehekin Landing does not meet operational needs during fire events, which typically occur in the upper Stehekin Valley. As a result, the Stehekin Airstrip is often used as a command center during fire events.
- The Stehekin Airstrip currently serves as a heliport during fire events. A helipad with an impervious surface is needed to provide a weed-free surface to prepare helicopter sling loads.
- The maintenance compound facilities within the park, including hazardous waste storage and solid waste operations, were built between the 1940s and 1980s. Due to changes in environmental standards and safety requirements, these facilities no longer adequately meet the park's needs.
- Given the total cost of facility ownership, i.e., the cost of both constructing and operating/ maintaining a facility over its design lifespan, consolidating widespread isolated facilities and designing/constructing them for financially and environmentally sustainable operations would be less expensive than continuing to operate and maintain existing facilities and infrastructure.
- In 1977, the NPS closed the Stehekin dump to comply with federal law. NPS and the Stehekin community had no alternative for solid waste disposal, so the NPS began operating a solid waste recycling, compaction, and transfer facility to handle NPS waste and waste from the Stehekin community, deter proliferation of small dumps on private lands, and prevent illegal dumping on public land. In 1994, NPS enacted solid waste regulations (36 CFR Part 6) for all units of the NPS system, which prohibited accepting solid waste from sources other than NPS sources beginning in 1996. Since then, the NPS has continued to collect solid waste from the Stehekin community in spite of the regulation prohibiting this practice. The NPS is currently pursuing a regulatory change that would authorize the continued collection of solid waste from the Stehekin community because this service remains essential.

- The Stehekin community private businesses generate 23.5 percent and residents generate 34.6 percent of all waste produced in Lake Chelan NRA; disposing of this waste costs approximately $54,000 per year. This cost is subsidized entirely by the operating budget for Lake Chelan NRA. The NPS cannot continue to subsidize this service. Options for cost recovery need to be explored with Chelan County and the residents and businesses of Stehekin.

## SELECTED ALTERNATIVE

The NPS selects the Preferred Alternative (Alternative 2) for implementation.

The Alternative 2 maintenance facility layout separates the maintenance functions from the fire facilities, clustering the maintenance facility and warehouse, solid waste facility, equipment storage, and hazardous material and fueling areas adjacent to the Stehekin Airstrip. Direct access to the site is provided from a dirt road that connects the quarry with Company Creek Road. An improved road connects to the fire facility areas, which are clustered together to the south, adjacent to the Stehekin Airstrip.

The Alternative 2 housing site is located on an inactive alluvial fan terrace on federal land. Access to the site is provided from the east side of the Stehekin Valley Road. The buildable area on the site is approximately 1.3 acres. The site falls within the existing utility line and road corridor and is near existing private housing.

Upon implementation of the solid waste rule change, the NPS would implement a new fee structure to charge non-NPS users for solid waste services at the new/relocated NPS transfer station in accordance with the guidelines of Director's Order (DO) 35B, Cost Recovery for NPS Produced Utilities.

The Selected Alternative will construct the following:

- **Maintenance Facility** – The existing maintenance facility will be removed from the floodplain and CMZ and new maintenance facilities will be consolidated in an area near the Stehekin Airstrip. The 12.4-acre site proposed for the new maintenance facility is located approximately 4.5 miles up the lower Stehekin Valley, on the west side of the Stehekin River, off Company Creek Road. The new maintenance facility will include an auto shop, welding shop, carpenter shop, and office area with an office conference room, and restroom. Outdoor maintenance facilities will include a covered storage structure attachment to the maintenance building with a concrete pad for miscellaneous maintenance equipment. In addition, a maintenance warehouse will be constructed that includes a large maintenance warehouse storage area, storage area for resource management, storage area for chain saws and road crew equipment, and maintenance bay for trail crew equipment. Hazardous material storage (paint, fuel, oil, pesticide, etc.) will be a separate but adjacent 700-square-foot building. Direct access to the site will be provided from a dirt road that connects the quarry with Company Creek Road.
- **Fire Facility** – The new fire facility will be separated from the maintenance facility and connected by an improved road adjacent to the Stehekin Airstrip. The new facility will include a large enclosed vehicle bay for a fire engine with space for pump/saw maintenance, work benches, storage cabinets, and crew lockers. Additional elements of the fire facility will include a fire cache for equipment storage; office space; fitness area with equipment and weights for training; and men's and women's restrooms, lockers, and showers. Outdoor fire facilities will include open grounds for a spike camp (a secondary camp site for fire crews), a helipad, small hazardous materials storage building, weather station, covered area for a generator, and covered vehicle bay for a second fire engine. A fire dorm will be constructed adjacent to the fire facility. The dorm will house ten people and include kitchen, restroom, and shower facilities. The new fire facility and dorm will be seasonally operated during the fire season, which typically runs from May through November. With the exception of limited work that may occur during the off season such

as fuels reduction, training, seasonal readiness, and close down, these facilities will not be occupied during the off season.

- **Solid Waste Facility** – The new transfer station will be located within a single building and will provide enclosed operations for sorting, processing, and storage of trash and recycled materials. The new transfer station will employ contemporary environmental methods for handling waste. Operations space inside the building will include sorting and processing equipment such as table(s), container(s), conveyor belt(s), cardboard baler(s), compactor(s), glass crusher, glass pulverizer, and a can flattener. Processing of recyclables will occur within the building. Compacting roll-off container(s) will be located outside the building with potential access from within the building.
- **Staff Housing** – One single-family house and two associated outbuildings will be removed from the floodplain and CMZ. A new single-family three-bedroom house will be built within the valley, outside of the floodplain and CMZ. The housing site is located on an inactive alluvial fan terrace on federal land. Access to the site is provided from the east side of the Stehekin Valley Road. The buildable area on the site is approximately 1.3 acres. The new residence will include approximately 1,600 square feet of gross habitable area plus a garage. The house will be in harmony and continuity with the valley's traditional character and style, scale and orientation, color, and texture of exterior surface. The site falls within the existing utility line and road corridor and is near existing private housing.
- **Site Restoration** – Where maintenance and housing facilities are removed, the area will be restored to more natural conditions by removing infrastructure, including buildings and foundations, septic systems, and power lines. Restoration will be representative of the surrounding undisturbed vegetation community and will include some combination of invasive species removal, soil amendment, and replanting with native plants. The existing ballfield will remain, both for continued community recreation and for intermittent use as a large spike camp during fire events.

## OTHER ALTERNATIVES CONSIDERED

The EA analyzed a no action alternative (Alternative 1) and two other action alternatives (Alternatives 3 and 4). Under all alternatives, the NPS would implement a new fee structure to charge non-NPS users for solid waste services at the existing or new/relocated NPS transfer station. The main distinction between the action alternatives analyzed in the EA is the layout of the maintenance facility elements and the location of new housing.

### Alternative 1, the No Action Alternative

The No Action Alternative would largely continue existing NPS practices within the Stehekin Valley. Existing NPS facilities are currently distributed throughout the lower Stehekin Valley. The existing maintenance facility, which consists of a solid waste transfer station, equipment maintenance building, small break building, hazardous materials storage building, fuel storage and filling area, and several small storage structures and outbuildings, would continue to operate in its current location within the 100-year floodplain. The existing fire facilities, including equipment and vehicle storage and fire crew housing, would remain in their current location at the Stehekin Landing. All existing NPS housing facilities would also remain in their current location and use. Replacement and relocation of the maintenance facility and NPS housing as discussed in the 1995 GMP would not occur at this time. In accordance with general asset management principles, as part of Alternative 1, the NPS would request funding to replace transfer station equipment that reaches the end of its estimated design life.

### Alternative 3

The Alternative 3 maintenance facility layout would separate the maintenance functions from the fire facilities, clustering the maintenance facility and warehouse, solid waste facility, equipment storage, and hazardous materials and fueling areas adjacent and south of the potential exchange property. An extended access drive would be provided from Company Creek Road. The fire facility, fire dorm, helipad, and spike camp would be clustered together to the northwest, adjacent to the Stehekin Airstrip.

The Alternative 3 housing site would be located at the base of the active Company Creek alluvial fan on federal land, directly north of the Stehekin Airstrip. Access to the site would be provided from Company Creek Road. The building area on the site would be approximately 1.22 acres. The site would fall within the Company Creek Road and utility line corridor and would be near the new maintenance facility site.

### Alternative 4

The Alternative 4 maintenance facility layout would combine the maintenance functions with the fire facilities, clustering the maintenance facility and warehouse, solid waste facility, equipment storage, hazardous materials and fueling areas, and fire facilities in one area adjacent to the Stehekin Airstrip. Access to the site would be provided from the dirt road that connects the quarry to Company Creek Road.

The Alternative 4 housing site would be located on the active Boulder Creek alluvial fan on federal land. Access to the site would be provided from the east side of Stehekin Valley Road. The building area on the site would be approximately 2.68 acres. The site would fall within the existing utility line and Stehekin Valley Road corridor.

## ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The Selected Alternative is the environmentally preferred alternative. All of the action alternatives have similar adverse impacts and benefits to the natural and built environment. All of the action alternatives would remove park facilities from the CMZ and floodplain, improving floodplain function, water quality, park operations, and public health and safety. All of the housing sites are located outside the floodplain and minimize impacts to vegetation. Also, all of the alternatives avoid impacts to known archeological resources such as the Old Wagon Road. However, the Selected Alternative has the least impact to vegetation, the smallest footprint for site disturbance, and the least impact to public safety because the housing site is not located on an active alluvial fan.

## ALTERNATIVES CONSIDERED AND DISMISSED

The following alternatives or layouts were considered during the design phase of the project, but for reasons allowed under NEPA (40 CFR 1502.14(a)), they were dismissed from further consideration. Site numbers listed below refer to those originally considered by the NPS planning team, as documented in the Predesign Document and Value Analysis Summary for Park Facilities Reconstruction and Relocation.

- **The gravel pit site** (3.7 acres), located west of the Stehekin Airstrip, was considered as a possible location for the new maintenance facility. The site raised potential flooding concerns from Company Creek and has no utilities. Access and development of the site would also disturb a large area since there is little development in the area. The site was eliminated from further consideration because the environmental impacts would be too great and because other planning documents identified the site east of the airstrip for the new maintenance facility.
- **The Stehekin Airstrip site** (54.4 acres) was considered as a possible location for the new maintenance facility. The airstrip is maintained and operated by the Washington State Department of Transportation Aviation Division under a special-use permit from NPS. The airstrip is used for emergencies and by Stehekin residents and visitors. Due to the vital safety and access role that it serves for the Stehekin community, the airstrip is not considered a viable site

for the new maintenance facility. Building on the airstrip would also be out of compliance with the *1995 Lake Chelan NRA General Management Plan*, which made the decision to move and replace the maintenance facility to a location adjacent to the Stehekin Airstrip.

- **Improving existing maintenance facilities** was also considered as an alternative to replacing these facilities. The current maintenance facility location is out of compliance with the *1995 Lake Chelan NRA General Management Plan*, which made the decision to move and replace the maintenance facility to a location adjacent to the Stehekin Airstrip outside of the CMZ of the Stehekin River. Improving the existing facility would also go against DOs 36 and 77-2 that encourage the NPS to remove facilities from floodplains. In addition to being located in the Stehekin River's CMZ and its 100-year and 500-year regulatory floodplain, the existing facilities are inefficient to operate. The existing solid waste facility requires a labor-intensive process and material-intensive packaging. The existing buildings also lack adequate insulation and have single-pane windows. The cost of improving and continuing to operate and maintain existing facilities and infrastructure is anticipated to be more expensive than the cost of constructing and operating/maintaining a new facility over its design lifespan. Therefore, the alternative of improving rather than replacing the existing maintenance facilities was dismissed from further consideration.
- **Housing site 1** (0.5 acre) has existing development, making it difficult to add new structures. Two existing septic tank drain fields occupy most of the site and limit development here. This site was eliminated as a viable location for NPS employee housing due to technical infeasibility.
- **Housing site 2** (2.61 acres), referred to as the Brownfield tract, was removed from consideration because the 2012 Land Protection Plan identifies it for possible land exchange. The site was eliminated as a viable location for NPS employee housing because it conflicts with an up-to-date, valid plan.
- **Housing site 3** (1.2 acres) was eliminated from consideration because it is close to an active portion of the Boulder Creek debris cone (geologic hazard) and has insufficient setback from the creek. The 2012 Land Protection Plan also identifies it for possible land exchange as part of Keller Park. The site was eliminated as a viable location for NPS employee housing due to technical infeasibility and because it conflicts with an up-to-date, valid plan.
- **Housing site 6** (1.8 acres) is north of a driveway that leads to a private house. It was removed from consideration because of aesthetic concerns since there is very little development visible from the road in this area.
- **The airstrip vicinity housing site** (approx. 3 acres) is located on the overall maintenance facility site. Originally, a number of different configurations of multiple houses were considered for co-location with the maintenance facility. Up to nine structures were located in this location. This alternative was dropped from consideration because (1) it was determined that housing near the maintenance area would not be desirable, (2) it created a government compound that further separated the NPS employees from the community, and (3) it has substantial impacts to forested wildlife habitat.
- **Allowing a private business or outside entity** to construct and operate a solid waste transfer station in Stehekin was also considered by the park as an alternative to the NPS replacing the existing transfer station. However, 36 CFR Part 6 Solid Waste Disposal Sites in Units of the National Park System applies to all lands and waters within the boundary of an NPS unit, whether federally or non-federally owned. Thus, any entity interested in operating a solid waste disposal facility, including a transfer station, would require a special regulation authorizing the acceptance of solid waste from non-NPS generators; and any entity opting to construct a new facility located within the boundaries of Lake Chelan NRA would be required to meet all of the establishment

requirements and siting restrictions for new facilities imposed by 36 CFR Part 6.4. Not all of the site restrictions and criteria for siting a new facility are achievable given the geographic constraints of the valley, and virtually any selected site would require a special regulation describing site-specific exceptions. While the NPS may pursue agreements or contracts to allow another entity to operate an NPS-owned solid waste facility following the rule change, the option to encourage another entity to construct and operate a solid waste transfer station was eliminated because of technical and economic infeasibility.

## BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES

The following measures identified in the EA will be incorporated into the project design and construction in order to avoid, minimize, and mitigate adverse impacts to analyzed resources. The responsible party for implementation of all measures is the NPS Project Manager, in cooperation with the Facility Manager, Resource Manager, and/or NPS Public Information Officer.

### Stehekin River CMZ and Floodplain

- Locate staging and stockpiling areas away from the Stehekin River
- Delineate staging areas to prevent incremental expansion of the staging area
- Minimize the amount of disturbed earth area and the duration of soil exposure to rainfall
- Minimize soil disturbance and re-seed or revegetate disturbed areas as soon as practical
- Stabilize disturbed areas until seeding and/or revegetation takes hold
- Install protective construction fencing around, adjacent to, or near wetland and/or riparian areas adjacent to the existing maintenance facilities to protect them during demolition activities
- Use a Storm Water Pollution Prevention Plan (SWPPP) for construction activities to control surface run-off, reduce erosion, and prevent sedimentation from entering water bodies during construction
- Develop and implement a comprehensive spill prevention/response plan that complies with federal and state regulations and addresses all aspects of spill prevention, notification, emergency spill response strategies for spills occurring on land and water, reporting requirements, monitoring requirements, personnel responsibilities, response equipment type and location, and drills and training requirements; use an oil and hazardous materials spill prevention, control, and countermeasure plan to address hazardous materials storage, spill prevention, and responses

### Soils and Surficial Landforms

- Minimize ground disturbance to the extent practicable
- Minimize driving over or compacting root-zones
- Salvage topsoil and duff from excavated areas for use in re-covering source area or other project areas
- Remove excavated soil alongside trees, and provide tree protection if needed for specimen trees
- Reuse excavated materials where possible in the project area
- Revegetate project areas through native seeding and planting
- Import weed-free clean fill from an NPS-approved site
- Clear and grub only those areas where construction would occur

- Comply with the guidelines for the use of material from the Stehekin gravel pit as outlined in the *Lake Chelan National Recreation Area: Sand, Rock and Gravel Plan* (1995)

### Vegetation and Wetlands

- Minimize construction limits and areas to be cleared where possible
- Clearly identify the construction limits to prevent expansion of construction operations into undisturbed areas
- Prior to construction, salvage native plant material only from areas to be disturbed; invasive plant material should be destroyed
- Restore staging and other temporarily impacted areas following construction, if necessary
- Utilize Integrated Pest Management (IPM) measures to prevent the spread of noxious, non-invasive plants, which include the following:
    - Import certified weed-free materials from outside Lake Chelan NRA
    - Avoid the use of stockpiled materials from the Company Creek Pit unless designated for the project
    - Wash all vehicles prior to barging to Stehekin; this includes all vehicles, but especially those that have come into contact with soil or materials that may contain noxious, non-native weed seed prior to working in weed-free areas or transporting weed-free materials
    - Cover stored soil and rock, as appropriate, to prevent exposure to noxious weed seed
    - Separate contaminated soil from weed-free soil and use the contaminated soil for subsurface fill
    - Conduct annual monitoring for potential weed infestation using early detection/rapid response eradication techniques
    - Identify and control exotic, non-native plant species infestations using IPM measures prior to construction (especially associated with the airstrip and old roads)

To the greatest extent possible, the Selected Alternative is located in existing clearings to minimize vegetation impacts. In particular, the proposed housing footprint is located within an existing clearing. The buildings at the new facility will be located to maximize the use of existing clearings at the time of construction. The existing airstrip access road, along the east side of the airstrip, will also be maintained and improved to provide access to the new maintenance facilities and minimize development of new roads.

### Wildlife

- Schedule construction activities with seasonal consideration of wildlife lifecycles to minimize impacts during sensitive periods (e.g., bird nesting and breeding seasons) to the extent practical
- Minimize the degree of habitat removal (vegetation clearing) by delineating construction limits
- Limit the effects of light and noise on wildlife habitat through controls on construction equipment and timing of construction activities, such as limiting construction to daylight hours to the extent practicable
- At the end of the day, cover excavated pits and trenches to prevent animals from being trapped

- Use spill prevention measures to prevent inadvertent spills of fuel, oil, hydraulic fluid, antifreeze, and other toxic chemicals that could affect wildlife; as required by law, prepare and implement a hazardous spill plan or SPCC
- Discourage construction personnel at work sites from providing a source of human food to wildlife, avoiding conditioning of wildlife and in human/wildlife conflicts (Title 36, CFR, Chapter 1, Section 2.10(d) prohibits anyone from leaving food unattended or stored improperly where it could attract or otherwise be available to wildlife; Title 36, CFR, Chapter 1, Section 2.14(a) prohibits the disposal of refuse in other than refuse receptacles; Title 36, CFR, Chapter 1, Section 2.2(a)(2) prohibits the feeding and molesting of wildlife)
- Maintain proper food storage, disposing of all food waste and food-related waste promptly, in a bear-resistant receptacle, and removing all garbage off-site at the end of each working day
- Employ, monitor and maintain erosion control measures at construction locations to minimize sediment inputs to aquatic habitats
- If surface water is used to disperse water on roads for dust abatement, decontaminate and examine any hoses or equipment that have the potential to come into contact with surface water for aquatic invasive species (AIS) prior to use

### Special Status Species

- Conduct pre-construction survey for western gray squirrels and spotted owls within the Selected Alternative footprint prior to construction; if active nests are found, consider implementing seasonal restrictions and/or preserving nest tree, if feasible. If spotted owls are detected, consultation with the US Fish and Wildlife Service (USFWS) must be reinitiated
- Store food and garbage in wildlife-resistant containers during the day and remove all garbage off-site from project work areas at the end of each working day

### Visitor Use and Experience

- Manage vehicle traffic and contractor hauling of materials, supplies, and equipment within the construction zone to minimize disruptions in visitor traffic (e.g., avoid traffic during the portion of the day that the ferry is docked)
- Protect existing vegetation where possible; effective use of the existing landscape and vegetation will help to accomplish all site design goals; new vegetation should be native to the Stehekin Valley
- Minimize noise, traffic, and dust during construction, specifically on public roadways and near residential areas
- Consider prefabricated wall panel construction to shorten the construction period, reduce on-site construction activities, and minimize construction waste

### Public Health and Safety

- Follow Federal Aviation Administration setback requirements to mitigate the risk of developing facilities near the Stehekin Airstrip, which could pose safety concerns to staff during emergency aircraft landings
- Prepare an early warning detection strategy (i.e., be aware of the severity of incoming storm events) and a robust evacuation plan for the facility to mitigate the risk of flooding and channel avulsion on the Company Creek alluvial fan

- Construct buildings with base floor elevations raised 1 to 2 feet above ground level to accommodate flooding
- Ensure that dry channels, which could become reoccupied, are not blocked by buildings or equipment
- Consider earthwork that could deflect or define flow routes in the event of channel avulsion

### Park Management and Operations

- Provide and maintain emergency vehicle access through the project area during construction
- Coordinate work with park liaison to minimize disruption to normal park activities
- Monitor construction activities to ensure adherence to mitigation measures and provide recommendations to minimize impacts on park resources
- Use functional, energy efficient appliances, and heating and cooling systems in new buildings
- Design efficient circulation spaces for new maintenance and housing areas
- Provide orientation about park resources for the contractor(s), including information regarding the special sensitivity of park resources and values and regulations

### Socioeconomics

- Coordinate with Stehekin businesses to increase waste diversion and recycling activities
- Incorporate the following stipulations into the project contract documents:
  - Encourage the use of local labor
  - Spray exposed soil with water to reduce emissions of fine particulate matter, smaller than 10 micrometers in diameter ($PM_{10}$), and deposition of particulate matter
  - Cover truck loads, wet materials in trucks, or provide adequate freeboard space in order to reduce $PM_{10}$; and deposition of particulates during transportation
  - Cover dirt, gravel, and debris piles as needed
  - Turn off construction equipment during prolonged periods of nonuse
  - Install mufflers on engines
  - Stage equipment as far away as possible from adjacent residences

## WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT

Using the ten significance criteria defined in the Council on Environmental Quality's NEPA regulations (Section 1508.27), the NPS has determined that the Selected Alternative will have no significant adverse effect on the human environment. The Selected Alternative can be implemented with no significant adverse impacts on floodplains, channel migration zones, water quality, soils or surficial landforms, vegetation, wetlands, wildlife, visitor use and experience, public health and safety, socioeconomics, or park management and operations. The following criteria were used to determine the significance of each impact:

1. **Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an environmental impact statement (EIS); no impacts are or have the potential to be significant.**

No major adverse impacts were identified for the Selected Alternative that would require analysis in an EIS. The majority of impact topics will have long-term beneficial effects with some adverse impacts that range from minor to moderate. Many of the adverse impacts are construction related and will, therefore, be temporary and unnoticeable after the first few years. Longer term adverse impacts to vegetation and wildlife will be minor because they are small, localized effects. Adverse impacts to visitor use and experience, public health and safety, and Socioeconomics range from minor to moderate adverse. These impacts are not considered significant because they are either small impacts, or would occur only very rarely, or are localized to small areas.

2. **Effects on public health and safety.**

Moving the maintenance facility and residence out of the Stehekin River floodplain and CMZ will reduce the risk of hazardous material or sewage from contaminating floodwaters. Constructing wildland fire protection facilities will enhance NPS firefighting and search and rescue operations that will also have beneficial health and safety effects. The Selected Alternative introduces a minor risk to human health and safety by constructing the new maintenance facility on an active alluvial fan. While there is the potential for mudslides and debris flow to occur during flooding of Company Creek, such an event is extremely rare and has not been observed in recent history. The more likely event that would pose risk to the facility is the potential for flooding across the alluvial fan. Mitigation to protect people and buildings is being incorporated into the final design for the new maintenance facilities.

3. **Unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).**

The Stehekin River is eligible for Wild and Scenic status under the Wild and Scenic Rivers Act (16 USC 1271-1287); however, the Selected Alternative will have no impact that could adversely affect the outstandingly remarkable values that qualify it for the National Wild and Scenic River System. None of the 28 historic structures in the Stehekin Valley will be impacted by the Selected Alternative. Similarly, neither of the two identified cultural landscapes in the valley will be impacted by this project. For these reasons, the issues of Wild and Scenic Rivers, Historic Structures and Districts, Cultural Landscapes, Ethnographic Resources, and Archeological Sites were all dismissed from further analysis in the EA. The work that will occur within floodplains and wetland buffers (no wetlands are impacted) will have long-term benefits to the area and therefore no statement of findings was prepared.

4. **Degree to which impacts are likely to be highly controversial.**

The results of the public involvement process do not indicate that the Selected Alternative was controversial. There appears to be broad support for construction of new facilities and general agreement that implementation of a solid waste disposal fee is necessary. However, the most prevalent concern expressed during public review of the EA was related to development and implementation of the new solid waste rate structure. A sample conceptual fee structure was included in the EA to assess the socioeconomic impact of the rule change and assess effects of the No Action alternative. This sample fee structure, particularly the inclusion of a fixed fee to cover recycling expenses and a 21 percent increase in fees to recover capital improvement costs associated with all action alternatives (as required by DO 35B), was controversial among a large number of commenters. In response to public concern, the park will request a partial fee waiver to reduce the fees that would be charged to Stehekin residents and businesses. The new rate structure will be defined after the rulemaking process, which is a separate process that requires approvals and public review independent from the EA. The NPS plans to hold additional public meetings during the rulemaking process and planning for fee implementation. Discussion topics at these public meetings may include facility operation, efficiency improvements, rate structure, customer categories, operating hours, invoice and billing mechanism, and enforcement.

5. **Degree to which impacts are highly uncertain or involve unique or unknown risks.**

   Constructing the new maintenance facilities on an active alluvial fan introduces a unique risk of flooding, mudslides, or debris flows in the vicinity of the facilities. While there is the potential for mudslides and debris flow across the Company Creek alluvial fan, this type of event is extremely rare and has not been observed in the time that people of European decent have occupied the valley. The more likely, but still rare, event is the potential for flooding across the alluvial fan. Mitigation to protect people and buildings from this unique flooding, should it occur, is being incorporated into the final design for the new maintenance facilities.

6. **Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.**

   The Selected Alternative neither establishes a precedent for future actions with significant effects, nor represents a decision in principle about a future consideration. However, as a result of public comment, the NPS will request a partial waiver from the cost recovery requirements as required in DO 35B. If approved, this would be the first waiver issued to this policy, and could affect future considerations for the NPS regarding how the DO is implemented.

7. **Whether the action is related to other actions that may have individual insignificant impacts but cumulative significant effects.**

   The EA considered the cumulative impacts of the Selected Alternative with several past, present, and future actions. Cumulative impacts for the Selected Alternative range from minor to moderate. The majority of cumulative impacts come from past and ongoing actions such as the construction and continued use of roads in the valley and other park-related facilities. Collectively, and including the Selected Alternative, these cumulative impacts are insignificant.

8. **Degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.**

   None of the forty-two archeological sites identified within five miles of the Selected Alternative will be directly affected by the Selected Alternative. The Selected Alternative will also avoid impacts to all sites on or eligible for the National Register of Historic Places. The State Historic Preservation Office concurred with this determination of no effect in July 2014.

9. **Degree to which an action may adversely affect an endangered or threatened species or its habitat.**

   The Selected Alternative will not adversely impact nesting or critical habitat for the federally threatened Northern Spotted Owl, but will impact 2.6 acres of potential foraging habitat for these birds, which is less than one tenth of one percent of the available owl habitat in the Stehekin Valley. Removal of approximately 2.6 acres of upland mixed conifer forest will also have a minor adverse impact to suitable habitat for the western gray squirrel (state threatened) and pileated woodpecker (state candidate). Removing suitable habitat is unavoidable and supports restoring the integrity of other park resources (wetland buffers, floodplains, and water quality) by removing the maintenance facility from the Stehekin River floodplain.

10. **Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.**

    Implementing the Selected Alternative would not violate federal, state, or local environmental protection laws. Proceeding with the rulemaking process will bring the NPS into compliance with current solid waste handling and disposal regulations.

## PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

### Public Scoping

The public scoping period for the replacement of administrative facilities began on June 11, 2013, and ended on July 10, 2013. During this time, the NPS held three open house public meetings in Stehekin (June 24, 2013), Wenatchee (June 25, 2013), and Seattle (June 26, 2013). A site walking tour was also conducted in Stehekin on June 25, 2013. A newsletter summarizing the purpose of the public scoping process and advertising the public meetings was circulated to interested parties and agencies in the summer of 2013. The meetings were attended by approximately 30 people. NPS staff and consultants recorded 29 comments on flip charts during the meetings. Eleven public comment letters were received during the scoping period: nine from individuals, one from a non-profit organization, and one from a Tribe.

Public comments from both the meetings and letters were generally related to alternatives, design issues, and previously identified issues. Relative to the range and definition of alternatives to be evaluated in the EA, the public recommended consideration of the gravel pit west of the airstrip as an alternative site for the new maintenance facility; consideration of alternatives that both include and exclude the land exchange property near the airstrip as part of the new maintenance facility; incorporation of floodproofing of the existing maintenance facility as part of the no action and action alternatives; and identification of the planned use for the existing maintenance facility site after it is demolished as part of the action alternatives. Several comments expressed preference for one housing site over another; however, an overwhelming preference for any one site was not evident.

Design issues raised by the public during the comment period include consideration of energy efficiency and the overall electrical demands of the new maintenance facility; use of a non-polluting, high-intensity incinerator at the new solid waste facility; a comprehensive composting and recycling program at the new maintenance facility; and light pollution and preservation of night skies in the design of the new maintenance facility.

Several concerns raised by the public during scoping that were previously identified by NPS staff for evaluation in the EA include the new fee structure for solid waste disposal; generation of additional traffic, dust, and noise along Company Creek Road from the new maintenance facility; protection of land exchange properties; electrical demands of the new maintenance facility; and potential impacts on archeological resources within or near the proposed maintenance facility and housing locations. A newsletter summarizing the results of the public scoping process was circulated to interested parties and agencies in the fall of 2013.

### EA Public Review

The public review period for the EA extended from November 4, 2014, to January 20, 2015. The initial public comment period was scheduled to end on December 7, 2014. However, based upon numerous public requests for additional review time, the comment period was extended an additional six weeks. A news release announcing the extension was issued on December 12, 2014. The EA was posted to the NPS project website at http://parkplanning.nps.gov/SMFRP. Hard copies of the EA were made available for review at the East Wenatchee Public Library, Golden West Visitor Center in Stehekin, Forest Service Ranger Station in Chelan, and at the main branch of the Seattle Public Library. A letter announcing the availability of the EA on the NPS project website and inviting public comment was distributed to over 300 interested parties and agencies.

During the public review period, Lake Chelan NRA held three open house public meetings in Stehekin (November 17, 2014), Wenatchee (November 18, 2014), and Seattle (November 19, 2014). A media release announcing the availability of the EA and advertising the public meetings was distributed to over 50 media organizations throughout the state on November 4, 2014. Notices of the public meetings were

posted on the NPS project website, and fliers advertising the meetings were posted at the Golden West Visitor Center in Stehekin and the Forest Service Ranger Station in Chelan. The meetings were structured as open houses with opportunities to talk with NPS staff, ask questions, and provide comments on the EA. A brief presentation describing the proposal was given by NPS staff shortly after the beginning of each meeting. In addition to NPS staff and consultants, the meetings were attended by approximately 14 people. Eight people signed in at the Stehekin Public Meeting, two people signed in at the Wenatchee Public Meeting, and four people signed in at the Seattle Public Meeting. No written comments were submitted during these public meetings.

Approximately fifty correspondences were submitted by agencies and individuals during the EA public comment period. These were received via the Planning, Environmental & Public Comment (PEPC) website (http://parkplanning.nps.gov/noca) or by NPS staff via email or letter. The greatest numbers of comments were related to the proposed solid waste fee structure, new alternative elements, socioeconomics of the proposed fee structure, and proposed changes in project design. The most prevalent comment was related to development and implementation of the new solid waste fee structure. Commenters expressed concern over the fixed fee component of the structure, capital improvement costs, the invoice and billing mechanism, enforcement, and the ability to "opt-out" of the system. Several individuals suggested new alternatives or new elements of existing alternatives, such as improving the existing solid waste facility rather than replacing the facility and allowing a private entity to operate the facility rather than the NPS. Several commenters also asked for clarification on the specific need to replace the existing housing and fire facilities.

Three correspondences were submitted by public agencies: Chelan County Public Works, the Washington State Department of Transportation (WSDOT) Aviation Division, and the USFWS. The remaining correspondences were submitted by individuals. A compilation of the public comments and the responses are provided separately.

### Agency/Tribal Consultation

The USFWS was consulted for potential impacts to listed species that are documented to occur in the lower Stehekin Valley via email correspondence on August 20, 2014. The EA was used in lieu of a Biological Assessment to conduct informal consultation under Section 7 of the Endangered Species Act. USFWS concurred with the determination of "may affect, not likely to adversely affect" for the northern spotted owl, gray wolf, grizzly bear, and Canada lynx as described in the EA on January 6, 2015.

WSDOT Aviation Division operates the Stehekin Airstrip under a special-use permit from the NPS. The airstrip is adjacent to the proposed maintenance facility site. During alternatives development, NPS consulted with the WSDOT airport manager to ensure that the appropriate WSDOT and Federal Aviation Administration (FAA) requirements and setbacks were considered during site design. The airport manager was contacted during public scoping for the EA in May of 2013 and was sent a copy of this EA during the public review period. The WSDOT Aviation Division submitted comments on the EA on January 20, 2015, highlighting issues such as the need for an aeronautical feasibility study, FAA review, and preparation of an Airport Master Plan for the Stehekin Airstrip. A response letter was submitted by the park to the Director of WSDOT Aviation on March 25, 2015, indicating the ongoing commitment to work with the WSDOT Aviation Division throughout the final design process to ensure compliance with appropriate FAA regulations.

The NPS initiated Section 106 consultation with the Department of Archeology and Historic Preservation (DAHP) during public scoping for the EA in May 2013. DAHP responded on June 10, 2014, concurring with the proposed Area of Potential Effect (APE) and survey approach. A cultural resources survey was prepared by NPS staff in April 2014 and submitted to DAHP on May 8, 2014. DAHP concurred with the NPS Determination of No Historic Properties Affected on July 22, 2014.

Letters summarizing the proposed project, as well as the proposed cultural APE and proposed survey methodology, were sent to the Confederated Tribes and Bands of the Yakama Nation, and the Colville Confederated Tribes. The Colville Tribe responded on May 14, 2014, agreeing with the proposed survey approach and APE. The cultural resources inventory report and consultation letters were submitted to the Colville Tribe and Yakama Nation on May 8, 2014. The Colville Tribe concurred with the NPS Determination of No Historic Properties Affected on August 15, 2014.

## CONCLUSION

Based on the environmental impact analysis contained in the EA, the mitigation measures designed to avoid, reduce, or eliminate potential impacts, and the results of public review and agency coordination, the NPS has determined that the Selected Alternative does not constitute a major federal action that would significantly affect the quality of the human environment. The Selected Alternative is not without precedent, nor is it similar to an action which normally requires an EIS. No connected actions with potential significant impacts were identified. Therefore, in accordance with the National Environmental Policy Act (1969) and regulations of the Council on Environmental Quality, requirements have been satisfied and preparation of an EIS is not required. Implementation of the Selected Alternative is contingent upon funding.

Recommended: _____ 08/19/2015
Superintendent, North Cascades National Park — Date

Approved: _____ 9/1/2015
Acting Regional Director, Pacific-West Region — Date

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**ATTACHMENT A**

# Determination of Non-Impairment

Replacement of Administrative Facilities at Stehekin
North Cascades National Park Service Complex
Lake Chelan National Recreation Area

August 2015

## THE PROHIBITION OF IMPAIRMENT OF PARK RESOURCES AND VALUES

NPS Management Policies 2006, §1.4.4, explains the prohibition on impairment of park resources and values:

> *While Congress has given the National Park Service (NPS) management discretion to allow impacts within units of the national park system, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the 1916 Organic Act, established the primary responsibility of the NPS. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.*

NPS Management Policies 2006, §1.4.5, What Constitutes Impairment of Park Resources and Values, and §1.4.6, What Constitutes Park Resources and Values, provide an explanation of impairment. Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. §1.4.5 states:

> *An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact is more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:*
>
> - *Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park*
> - *Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or*
> - *Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.*

An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per §1.4.6 of Management Policies 2006, park resources and values at risk for being impaired include:

- *the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological*

*resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;*

- *appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;*
- *the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and*
- *any additional attributes encompassed by the specific values and purposes for which the park was established.*

Impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park. The description of the Lake Chelan National Recreation Area (NRA) purpose and significance is found below and is subject to the no-impairment standard.

## PURPOSE AND SIGNIFICANCE OF LAKE CHELAN NATIONAL RECREATION AREA

The purpose of Lake Chelan NRA is to "...complement North Cascades National Park and conserve the scenic, natural and cultural values of the Lower Stehekin Valley, Lake Chelan and surrounding wilderness, while respecting the remote Stehekin community, for outdoor recreation and education." Today, Lake Chelan NRA functions as a gateway to more than two million acres of roadless wilderness.

The following statements from the North Cascades NPS Complex *Foundation Document* are those that apply specifically to Lake Chelan NRA.

- *Within Lake Chelan NRA, Stehekin is a private community that provides visitors with an opportunity to see and experience life in a remote setting that is not accessible by roads and is surrounded by wilderness.*
- *Set in a glacier-carved trough between steep valley walls, Lake Chelan is the nation's third deepest lake. Fed by glacial melt and the Stehekin River, it is known for its exceptionally cold and clear water.*
- *Lake Chelan NRA provides a spectrum of recreational opportunities that transition from highly mechanized to primitive as one moves from the lake, up the Stehekin Valley, and into the wilderness.*

## IMPAIRMENT DETERMINATION FOR SELECTED ALTERNATIVE

This determination of no impairment has been prepared for the action detailed in the Finding of No Significant Impact (FONSI) as the Selected Alternative. An impairment determination is not provided for the following topics analyzed in the *Replacement of Administrative Facilities at Stehekin Environmental Assessment* (EA): visitor experience, socioeconomics, public health and safety, and park operations. This is because impairment findings relate back to park resources and values. These impact areas are not generally considered to be park resources or values according to the 1916 Organic Act, and cannot be impaired the same way that an action can impair park resources and values. Cultural resource topics were dismissed from further analysis in the EA (see section 1.5.2). Therefore, the impairment analysis focuses only on natural resource topics.

### Stehekin River CMZ and Floodplain

The lower Stehekin River and its associated floodplain and channel migration zone (CMZ) is a key natural resource within the Lake Chelan NRA. This river segment is a flat, braided system characterized by a network of smaller channels adjacent to the main channel. During flood events,

the river over tops its channel and flows at shallow depths through the floodplain. Large floods, sediment movement, and the presence of semi-stable large woody debris make the channel and floodplain ever-changing. The CMZ, the boundary of where the river can reasonably move, is defined by natural features such as topography created by older glacial activity and more recent alluvial fans, and the presence of woody debris and vegetation. The Stehekin River floodplain is determined by hydraulic modeling based on estimates of 100-year peak flows. Both the CMZ and the floodplain represent upper limits for the dynamic activity of the Stehekin River and define the boundaries of this riparian resource.

The Selected Alternative will remove the maintenance facility and the house from both the CMZ and the floodplain and construct new facilities outside of the CMZ and floodplain boundaries. This action provides a long-term benefit to the CMZ and the floodplain by improving the function and values of the Stehekin River. This action also serves to protect maintenance facility buildings and housing from flood damage. Because the Selected Alternative benefits both the CMZ and floodplain, there would be no impairment to these resources from this action.

**Water Quality**

The Stehekin River is a Category I waterway under the Water Quality Standards for Surface Waters of State of Washington (WAC 173-201A). Category I waterways meet testing standards for clean water and are given maximum protection under state water quality regulations. Excellent water quality is a key element to the Stehekin River natural resource. Under existing conditions water quality can be temporarily affected during flooding by the presence of the maintenance facility, solid waste transfer station, fuel storage and filling area, hazardous materials trailer, and septic tanks.

The Selected Alternative will remove the maintenance facility and associated buildings from the Stehekin River floodplain. This action will minimize the risk of water quality degradation during flooding by removing stored hazardous materials and waste from contact with floodwaters. Because the Selected Alternative provides long-term water quality benefits, there would be no impairment to this resource from this action.

**Soils and Surficial Landforms**

The Stehekin Valley within the Lake Chelan NRA contains 22 distinct soil series. The movement of the river and its tributaries erodes and deposits sediment along the valley bottom thereby creating floodplains, alluvial fans, and terraces. The steep valley walls are covered with varying amounts of glacial sediment, talus, bare rock, colluvial (slope) deposits, and volcanic ash. Together, these soils and the geologic systems that they are a part of are recognized as a fundamental valued resource in Lake Chelan NRA and are key to the natural integrity and enjoyment of the park.

Long-term effects from the presence of the maintenance facility and the house include soil compaction and soil covering that reduce pore space within the soil matrix, reduce infiltration, and remove the covered area from production. However, these minor adverse impacts are expected to be offset by the removal of buildings and the restoration of soil at their existing locations. The soil type at the existing maintenance facility is typically more productive than soil at the proposed site. Therefore, restoring the existing site is considered a beneficial overall improvement. Because the Selected Alternative provides a long-term benefit to soils, there would be no impairment to this resource from this action.

**Vegetation**

The Stehekin Valley contains a wide diversity of plant species and vegetation communities. The Selected Alternative is located within the nutrient rich riparian zone. Observations indicate that plant community composition at the proposed maintenance facility location includes Douglas fir,

ponderosa pine, bigleaf maple, and cottonwood in the overstory; and grand fir, ocean spray, Oregon grape, and various grasses and forbs in the understory. Plant community composition at the Selected Alternative housing site generally consists of Douglas fir and ponderosa pine dominating the overstory; and western yarrow, bluebells, ocean spray, ceanothus, pinegrass, serviceberry, and Oregon grape in the understory.

Plant community composition at the existing maintenance facility and existing residence to be removed are highly disturbed. Generally, no native vegetation remains in the footprints of these facilities. A combination of mixed conifer, mixed coniferous/deciduous, and wetland plant communities dominated by a variety of nonnative species and native species exist around the fringes of these facilities.

Construction of the Selected Alternative would have minor adverse impacts to vegetation through the removal of approximately 2.6 acres of upland mixed conifer forest. Approximately 200 individual trees are planned for removal; 38 of these trees are larger than 21 inches diameter at breast height. This total impact is from 2.4 acres of vegetation removed at the maintenance facility site and 0.2 acre removed at the housing site.

The 2.6 acres of impact is about one tenth of one percent of the approximately 2,000 acres of upland mixed conifer forest mapped in the Stehekin Valley. This impact will be partially off-set by restoring 2.0 acres of the existing maintenance facility and housing site. While it will take time for the restored area to fully grow, the long-term impact is reduced to 0.6 acre of permanently removed vegetation.

Vegetation resources are necessary to fulfill the purposes for which the park was established, are identified in park planning documents as significant, and are key to the natural integrity and enjoyment of the park. Although the Selected Alternative has minor impacts to vegetation, most of this impact is mitigated by restoration of the existing site. The remaining unmitigated impact is unavoidable and supports restoring the integrity of other park resources (floodplains and water quality) by removing the maintenance facility from the Stehekin River floodplain. Therefore, this action does not constitute an impairment.

**Wetlands**

Large complexes of palustrine forested and scrub/shrub wetlands are present throughout the Stehekin River floodplains, occupying many of the side channels and tributaries. A palustrine forested wetland is located adjacent to the existing maintenance facility. This wetland is associated with a side channel of the Stehekin River that has been modified by a variety of human activities, including use as a mill pond and impacts from construction of Company Creek Road and the access road to the existing maintenance facility. Although this wetland is mapped as being within the boundaries of the existing maintenance facility, it is actually only adjacent to it.

No wetlands are present with the footprint of the Selected Alternative at either the maintenance facility location or the housing site. Because there are no impacts to wetlands by the Selected Alternative, there would be no impairment to wetland resources from this action.

**Wildlife**

Within the Lake Chelan NRA and the 1.8 million acres of federally protected land surrounding it, a nearly intact assemblage of native wildlife species persists, including large carnivores. Although some species have experienced serious population declines in the past 150 years, there remains 40 species of mammals, over 100 bird species, seven reptile species, and five species of amphibians. The most abundant mammal species that are commonly observed in the valley include mule deer (*Odocoileus hemionus*), marten (*Martes Americana*), striped skunk (*Mephitis mephitis*), northern flying squirrel (*Glaucomys sabrinus*), and snowshow hare (*Lepus americanus*); Trowbridge's,

montane, and vagrant shrews (*Sorex trowbridgii, S. monticolus,* and *S. vagrans*); creeping vole (*Microtus oregoni*); Douglas's squirrel (*Tamiasciurus douglasii*); Townsend's chipmunk (*Eutamias townsendii*); yellow-pine chipmunk (*Eutamias amoenus*); and Cascades golden-mantled ground squirrel (*Spermophilus saturates*), Yuma myotis (*Myotis yumanensis*), and little brown myotis (*Myotis lucifugus*). The predominate bird species in the Stehekin Valley are Hammond's flycatcher, Swainson's thrush, American robin, red-eyed vireo, yellow-rumped warbler, MacGillivray's warbler, western tanager, and dark-eyed junco. Common reptiles include the common garter snake (*Thamnophis sirtalis*), western terrestrial garter snake (*Thamnophis elegans*), western fence lizard (*Sceloporous occidentalis*), and the northern alligator lizard (*Gerrhonotus coeruleus*). Amphibians include the northwestern salamander (*Ambystoma gracile*), rough-skinned newt (*Taricha granulosa*), Columbia spotted frog (*Rana luteiventris*), Cascades frog (*Rana cascadae*), and western toad (*Bufo boreas*).

Construction of the Selected Alternative will have minor adverse impacts to wildlife through removal of approximately 2.6 acres of upland mixed conifer forest, including 200 individual trees. This total impact is from 2.4 acres of vegetation removed the maintenance facility site and 0.2 acre at the housing site. At the maintenance facility, this forest is a mid-seral habitat (not mature forest) with high canopy closure and relatively sparse understory. In general, this habitat removal will have long-term localized minor adverse impacts on foraging, resting, and breeding habitat for a wide range of common wildlife species that may use this area, including songbirds, tree squirrels, ground squirrels, woodpeckers, raptors, and deer.

These effects will be off-set to a large degree by restoring 2.0 acres of forest at the existing maintenance facility and housing site. This restoration will include some combination of soil amendment, non-native plant removal, and planting of native shrubs and trees, particularly in the riparian buffer of the adjacent wetland. This restoration will improve habitat quality for species like amphibians and cavity-nesting birds and bats. However, there would still be a temporary loss of habitat structure until the planted area gained the same size and age as the removed habitat.

Wildlife and the associated supporting habitat are necessary to fulfill the purposes for which the park was established, are identified in park planning documents as significant, and are key to the natural integrity and enjoyment of the park. Although the Selected Alternative has minor impacts to wildlife, most of this impact is off-set by restoration of the existing site. The remaining unmitigated impact is unavoidable and supports restoring the integrity of other park resources (wetland buffers, floodplains, and water quality) by removing the maintenance facility from the Stehekin River floodplain. Therefore, this action does not constitute an impairment.

**Special Status Species**

Many of the special status species known to live in eastern Washington have the potential to reside in the Lower Stehekin Valley. Of the eleven special status mammal species, only the Western gray squirrel has been documented within the Stehekin Valley and likely uses the Selected Alternative area as habitat on a periodic basis. Of the fourteen special status bird species, there are two whose presence has been documented in the Stehekin Valley—the Northern Spotted Owl, and the Pileated Woodpecker. None of the Northern Spotted Owl nesting sites are in the proximity of the Selected Alternative, and no critical habitat for this species is present in the Stehekin Valley. Although there are six sensitive plant species that can potentially occur in the Lower Stehekin Valley, none of them have been found at the site for the Selected Alternative.

The only federally listed species that is documented to occur in the Stehekin Valley and has habitat potentially affected by the Selected Alternative is the Northern Spotted Owl. The forest located at the maintenance facility site is not suitable breeding habitat due to its lack of old growth characteristics and high level of human activity, but could provide suitable foraging and dispersal habitat for spotted owls, particularly the pair that nests at McGregor Meadows. The Selected

Alternative would remove less than one tenth of one percent of spotted owl suitable habitat in the Stehekin Valley.

Removal of approximately 2.6 acres of upland mixed conifer forest will have minor adverse impacts to western gray squirrel habitat. Although gray squirrel nests have not been documented in the Selected Alternative area, suitable habitat is present. Based on available research, it appears that the amount of suitable habitat present in the Stehekin Valley far exceeds the extant squirrel population.

The Selected Alternative will have minor adverse impacts to pileated woodpecker roosting and nesting habitat. These large cavity-nesting birds have not been observed nesting on the maintenance facility site, but suitable nest trees are present. However, pileated woodpeckers are common in the valley and not habitat-limited.

Habitat losses incurred by the Selected Alternative would be off-set by restoration of 2.0 acres at the existing maintenance facility site and housing site. However, there would still be a temporary loss of habitat structure until the planted area gained the same size and age as the removed habitat. The remaining unmitigated impact is unavoidable and supports restoring the integrity of other park resources (wetland buffers, floodplains and water quality) by removing the maintenance facility from the Stehekin River floodplain. Therefore, this action does not constitute an impairment.

## SUMMARY

The impacts documented in the EA, and summarized above, will not affect resources or values key to the natural or cultural integrity of the Lake Chelan NRA. Nor will the impacts alter opportunities for public enjoyment of Lake Chelan NRA. Therefore, the Selected Alternative will not violate the NPS' Organic Act of 1916 or related provisions of law.

**ATTACHMENT B**

# ERRATA

Replacement of Administrative Facilities at Stehekin Environmental Assessment
North Cascades National Park Service Complex
Lake Chelan National Recreation Area

August 2015

## INTRODUCTION

The *Replacement of Administrative Facilities at Stehekin Environmental Assessment* (November 2014) was released for public review from November 4, 2014, to January 20, 2015. A total of 51 correspondences containing 129 comments were received during the public review period. The errata records changes to the text of the *Replacement of Administrative Facilities at Stehekin Environmental Assessment* as a result of comments received since the document was released on November 4, 2014. These edits correct, clarify, or modify original text based on public comments and correct other inaccuracies in the environmental assessment (EA). The corrections in this errata sheet do not change the project activities described in the EA. However, the erratum does change the degree of impact for one resource. Under the Socioeconomics impact topic, the EA concludes that implementation of the new solid waste fee, at both the existing and new solid waste facility, would result in a "minor adverse" impact on local residents. This erratum clarifies that the impacts have been changed to "moderate adverse." The EA, errata, and finding of no significant impact comprise the full and complete record of the environmental impact analysis.

## EDITS AND CORRECTIONS TO THE EA

Changes to the text of the EA are provided as follows. Existing text from the EA is shown in regular font, additions to the text are underlined, and deleted text is shown as a ~~strikeout~~. Notes are provided in bold as needed.

### Section 1.1.2, Need for the Action (Page 1)

This action is needed because:

- Existing park facilities are located within the Stehekin River's CMZ, as well as its 100- and 500-year regulatory floodplains. NPS facilities in the floodplain not only experience flood-related damage, but also adversely affect the natural characteristics of the floodplain, including the CMZ. Additionally, current storage of solid waste and hazardous materials within the 500-year floodplain and location of aging septic systems within the 100-year floodplain threaten public health and safety and natural resources. The park must comply with Executive Order 11988 (Floodplain Management) (42 FR [Federal Register] 26951, 3 CFR [Code of Federal Regulations]), which "requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains, and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative" (Federal Emergency Management Agency [FEMA] n.d.).
- Existing ~~employee housing,~~ solid waste facilities~~,~~ and park maintenance facilities~~, and infrastructure~~ are inefficient to operate~~ because many of these facilities are in poor condition and were designed for purposes other than their current use~~. The compaction equipment, which is nearly two decades old, is undersized to handle the current waste stream and requires labor-

intensive processing and material-intensive packaging. The existing maintenance facility buildings also lack adequate insulation and have single-pane windows. Other operational inefficiencies include outdated heating systems in the office, maintenance shop, and carpenter shop and no heating in the solid waste facility and warehouse. The carpenter shop has no restroom facilities and is located in a residential outbuilding over one-quarter mile away from the rest of the maintenance complex, resulting in lost production time. The warehouse has little insulation and cannot be used to store materials sensitive to freezing or summer temperatures. The disassociated locations of the maintenance buildings result in inefficiencies due to increased travel time, vehicle cost, and productivity, especially during the winter months when snow removal is required.

- The single-family employee housing unit and adjacent structures on Company Creek Road are in poor condition. These structures were recommended for demolition in a *Title I Report for Housing, Stehekin* completed in 1992 because they were poorly constructed, have inadequate insulation, and are located within the Stehekin River CMZ and floodplain. These structures have all been subjected to flooding, resulting in a safety hazard and forcing employees to be temporarily relocated during flood events.
- The location and design of the existing fire facility (Hilton) does not meet operational needs. The Hilton is a dorm-style crew bunkhouse with daylight basement apartment and attached garage. The Hilton was used by the US Forest Service to house seasonal employees and as a shop / equipment storage area. When the NPS acquired the facility, it was also used for seasonal housing and equipment storage. It wasn't until 1995 with the implementation of the Forest Fuel Reduction Program that the facility was reserved for use by the Fire Crew. The limited number of beds (4) at the Hilton does not provide sufficient capacity for seasonal fire park employees. The location of the Hilton at the Stehekin Landing does not meet operational needs during fire events, which typically occur in the upper Stehekin Valley. As a result, the Stehekin Airstrip is often used as a command center during fire events.
- The Stehekin Airstrip currently serves as a heliport during fire events. A helipad with an impervious surface is needed to provide a weed-free surface to prepare helicopter sling loads.
- The maintenance compound facilities within the park, including hazardous waste storage and solid waste operations, were built between the 1940s and 1980s ~~and have far exceeded their useful life~~. Due to changes in environmental standards and safety requirements, these facilities no longer adequately meet the park's needs.

**Note: remaining bullets in this section are unrevised.**

### Section 1.5.2.10, Issues Dismissed from Further Analysis – Environmental Justice

Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations) (59 FR 7629, as amended by Executive Order 12948, 60 FR 6381, 42 USC 4321) requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and/or adverse ~~levels of~~ human health or environmental effects of ~~from~~ their programs and policies on minorities and low-income populations and communities. ~~Effects are expected to be similar for residents of the Stehekin Valley, without disproportionate effects on disadvantaged populations; therefore, this issue will not be further addressed.~~

Although the Stehekin community contains low-income populations, environmental justice was dismissed as an impact for the following reasons:

- The Park staff and planning team actively solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.

- Implementation of the Selected Alternative would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income population.
- The human health or environmental impacts associated with implementation of the preferred alternative would not disproportionately affect any minority or low-income population or community.

### Section 2.3.1.1, Alternative 1: No Action – Solid Waste Handling Activities (Page 26)

**The following text replaces the last paragraph in this section.**

In accordance with DO 35B guidelines, parks may employ phased implementation for rate increases, and non-NPS users may request a waiver of all or part of the implementation requirements of DO 35B. Phased implementation of cost recovery is anticipated once the rule change goes into effect to ensure that non-NPS users would experience no more than a 10 percent rate increase per year, based on an initial or baseline rate calculation. Utility rates may also be adjusted when the cost to non-NPS users is extraordinarily high and full cost recovery would raise prices for visitor services to an unacceptable level or jeopardize the economic vitality of a non-NPS user. Under any phased implementation or approved waiver scenario, u~~U~~tility rates would be reviewed and updated annually to reflect the 10 percent increase until ~~full~~ cost recovery at either the full or a waived and reduced rate is achieved. Additional detail regarding the rulemaking process and planning for fee implementation, including a preliminary schedule, is provided in section 3.1.3.9.

In accordance with general asset management principles, funding will be requested to replace transfer station equipment that reaches the end of its estimated design life. Funding is currently being sought to replace the glass crusher with a glass pulverizer, which will eliminate transportation costs associated with recycling crushed glass by creating silica sand particles that can be reused as a sand substitute within Stehekin. The park also obtained funding in 2015 to implement transfer station building upgrades and replace two 1/3-cubic-yard stationary trash compactors with a 2-cubic-yard stationary compactor and two 30-cubic-yard roll-off compaction containers. These equipment upgrades are expected to improve operational efficiency, reduce transportation costs, and support park sustainability principles. This equipment would be transferred to the new solid waste facility if and when it is constructed.

### Section 2.3.2.1, Maintenance Facility – Solid Waste Facility (Page 29-30)

**The following text is added to the second paragraph of the section on Page 29.**

As described in section 2.3.1.1, funding is currently being sought to replace transfer station equipment that reaches the end of its estimated design life. This equipment would be transferred to the new solid waste facility if and when it is constructed.

**The following text is added to the last paragraph of the section on Page 30.**

Additional detail regarding the rulemaking process and planning for fee implementation, including a preliminary schedule, is provided in section 3.1.3.9.

### Section 2.3.2 Actions Common to All Action Alternatives – Figures 5, 6, 7, 8, 9, and 10

**In the legend, "New Paving" is replaced with "Compacted Gravel."**

### Section 2.3.2.4 Actions Common to All Action Alternatives – Construction Activities (Page 30)

**The following correction is made to the bullet list in this section.**

- **Site preparation**. Vegetation clearing, grading, installation of utilities, installation of foundations, and ~~paving of~~ installation of compacted gravel on selected sites for new facilities.

### Section 2.3.6, Alternatives Considered but Dismissed (Page 38)

**The following bullets are added to the bullet list in this section.**

- **The Stehekin Airstrip site** (54.4 acres) was considered as a possible location for the new maintenance facility. The airstrip is maintained and operated by the WSDOT Aviation Division under a special-use permit from NPS. The airstrip is used for emergencies and by Stehekin residents and visitors. Due to the vital safety and access role that it serves for the Stehekin community, the airstrip is not considered a viable site for the new maintenance facility. Building on the airstrip would also be out of compliance with the *1995 Lake Chelan NRA General Management Plan*, which made the decision to move and replace the maintenance facility to a location adjacent to the Stehekin Airstrip.
- **Improving existing maintenance facilities** was also considered as an alternative to replacing these facilities. The current maintenance facility location is out of compliance with the *1995 Lake Chelan NRA General Management Plan*, which made the decision to move and replace the maintenance facility to a location adjacent to the Stehekin Airstrip outside of the CMZ of the Stehekin River. Improving the existing facility would also go against directors orders that encourage the NPS to remove facilities from floodplains. In addition to being located in the Stehekin River's CMZ and its 100-year and 500-year regulatory floodplain, the existing facilities are inefficient to operate. The existing solid waste facility requires a labor-intensive process and material-intensive packaging. The existing buildings also lack adequate insulation and have single-pane windows. The cost of improving and continuing to operate and maintain existing facilities and infrastructure is anticipated to be more expensive than the cost of constructing and operating/maintaining a new facility over its design lifespan. Therefore, the alternative of improving rather than replacing the existing maintenance facilities was dismissed from further consideration.

### Section 2.5.2, Measures to Avoid, Minimize, or Mitigate Impacts – Soils and Surficial Landforms (Page 41)

**The following bullet is added to the bullet list in this section.**

- Comply with the guidelines for the use of material from the Stehekin gravel pit as outlined in the Lake Chelan National Recreation Area: Sand, Rock and Gravel Plan (1995)

### Section 3.1.3.9, Special Regulation (Page 54)

**This section is replaced with the following text.**

As described in section 1.1.4, the NPS has prepared a proposed rule/special regulation to authorize collection and disposal of solid waste generated from non-NPS activities. This special regulation would enable the NPS to continue to accept non-NPS generated solid waste and allow a new solid waste transfer station to be constructed in a more environmentally suitable location within Lake Chelan NRA. The proposed rule/special regulation was prepared in coordination with the NPS Regulations Program Manager. Notice of the proposed rule was published in the Federal Register on July 13, 2015. This publication initiated a 90-day public comment period.

The NPS will hold public meetings during the comment period to discuss both direct and indirect impacts of the proposed rule. While this special regulation will authorize an NPS transfer station within Lake Chelan NRA, it does not supersede or replace other requirements applicable to solid waste disposal sites, including the requirement that NPS recover the cost of utilities provided to non-NPS users, in accordance

with DO 35B. Implementation of a solid waste fee is not part of the proposed rule. However, the proposed rule will bring the NPS into compliance with solid waste regulations, thereby allowing the NPS to initiate compliance with agency policy by establishing a fee structure for solid waste service. While both the proposed rule and implementation of fees will be discussed at these public meetings, only the transfer station authorizations would be implemented through publication of the rule. NPS implementation of a solid waste fee will occur on a separate but related timeframe as shown in the schedule below.

Following the public comment period, after all substantive comments and necessary changes have been incorporated, a final rule will be re-circulated for surname and signature. The final rule must be published in the Federal Register, and will take effect 30 days after publication.

Once the rule goes into effect and NPS has legal authority to accept solid waste from non-NPS entities (i.e. private residents and businesses), the NPS will take action to begin cost recovery and select an appropriate rate structure, as articulated in DO 35B. Ultimately, the rate structure that is adopted must be as equitable as possible to all users. In addition to holding public workshops associated with the proposed rule, the NPS anticipates scheduling subsequent public meetings in coordination with Chelan County to discuss development and implementation of the solid waste cost management plan. Discussion topics at the public meetings may include the following:

- Facility Operation
- Efficiency Improvements
- DO 35B Waiver Request
- Rate Structure
- Customer Categories
- Operating Hours
- Invoice and Billing Mechanism
- Enforcement

A preliminary schedule of the rulemaking process and planning for fee implementation follows:

| | Date | Rulemaking Process | Planning for Fee Implementation |
|---|---|---|---|
| 2015 | July | NPS submits proposed rule to Federal Register | |
| | August | Proposed rule published in Federal Register – 90-day comment period & public meetings | |
| | September | | Fees discussed during public meetings |
| | October | NPS reviews comments & incorporates changes into final rule | |
| | November | Final rule re-circulated for surname & signature | |
| | December | | Additional public workshops held in coordination with Chelan County |
| | December | Final Rule published In Federal Register | NPS submits waiver request on behalf of all non-NPS users |
| 2016 | January | Final rule goes into effect | NPS notifies users of proposed rates and logistics |
| | February | | |
| | March | | |
| | April | | New solid waste rates go into effect |

## Section 3.2.9.4, Socioeconomics – Alternative 1 (No Action) (Page 120-121)

**Edits and corrections to limited portions of the existing text are as follows.**

### *Analysis*

**TABLE 10: SOLID WASTE FEE ESTIMATES PER GENERATOR (NO ACTION)**

| Generator | Percent of Total 2010 Trash[1] Volume | Estimated Total 2013 Trash[1] Volume (tons) | Estimated Annual Fixed Fee[2] ($/year in FY 2014) | Estimated Total Annual Fee[3] ($/year in FY 2014) | Estimated Total Monthly Fee[4] ($/month in FY 2014) |
|---|---|---|---|---|---|
| NPS | 19.7% | 20.4 | $3,643 | $20,237 | $1,686 |
| Stehekin Lodge and Resort | 22.1% | 22.9 | $4,086 | $22,702 | $1,892 |
| Stehekin Valley Ranch | 11.6% | 12.0 | $2,145 | $11,916 | $993 |
| Stehekin Pastry Co. | 11.9% | 12.3 | $2,200 | $12,224 | $1,019 |
| Other Businesses | 0.1% | 0.1 | $18 | $103 | $9 |
| Private Residents[5] | 34.6% | 35.8 | ~~$9,367~~6,398 | ~~$43,007~~35,543 | ~~$3,584~~2,962 |
| **Total** | **100.0%** | **103.4** | **$18,490** | **$102,725** | |

1. Trash = MSW disposed.
2. The distribution of fixed fee has not yet been determined. The fee shown here is representative only and is based upon the percent of 2010 trash volume by generator multiplied by the total cost of recycling in FY 2013 ($18,490).
3. Total O&M costs multiplied by percent of total 2010 trash volume; Estimated Total Annual Fee includes Estimated Annual Fixed Fee.
4. Estimated Total Monthly Fee includes Monthly Fixed Fee and assumes a 12-month operating season.
5. Private Residents includes all 155 seasonal and year-round residents of Stehekin. Estimated fees are for the total population and would be distributed on a per-person or per-household basis in accordance with designated user groups.

Source: NPS 2014d.

The estimated combined or total annual fee for private residents is ~~$43,007~~35,543. This would be distributed amongst Stehekin's 75 year-round and 80 seasonal residents, including children. The fee distribution has not yet been determined by the NPS. However, if the fee is evenly distributed based upon the number of months each resident is physically in Stehekin, and it is assumed that seasonal residents are in Stehekin four months per year (resulting in 1,220 total person-months), the monthly fee per resident would be approximately ~~$35.25~~29.13 per month. This amount includes the combined or total fixed fee for all private residents, estimated at ~~$9,367~~6,398 per year. The fixed fee component equates to approximately ~~$7.68~~5.24 per person per month. The total annual fee for year-round residents would be approximately ~~$515~~350, representing ~~21~~ percent of the per capita income of $27,882. For households with large families, the proportion of per capita income could be much greater. The total annual fee for seasonal residents would be approximately ~~$172~~117. These estimated annual fees represent full cost recovery, which is not anticipated for many years given a reduced initial rate and annual rate increase capped at 10 percent. This reduction in discretionary income is considered a ~~minor~~ moderate adverse impact on local residents.

### *Cumulative Impacts*

Economic impacts on Stehekin businesses would be a minor to moderate adverse impact, and the reduction in discretionary income for local residents is considered a ~~minor~~ moderate adverse impact.

### *Conclusion*

The reduction in discretionary income for local residents is a ~~minor~~ moderate adverse impact.

## Section 3.2.9.5, Socioeconomics – Alternative 2 (Preferred) (Page 121-122)

**Edits and corrections to limited portions of the existing text are as follows.**

### *Analysis*

Under Alternative 2, fees for all generators would be 21 percent higher than the fees estimated under Alternative 1 (Table 10). This would result in moderate adverse impacts on Stehekin businesses and ~~minor adverse impacts on~~ local residents.

### *Cumulative Impacts*

Economic impacts on Stehekin businesses would be a moderate adverse impact and the reduction in discretionary income for local residents is considered a ~~minor~~ moderate adverse impact.

### *Conclusion*

The reduction in discretionary income for local residents is a ~~minor~~ moderate adverse impact.

## EA COMMENTS AND RESPONSES

This section summarizes the comments that were received during the public review period of the EA into concern statements and provides a response to the concerns that were raised.

**Concern Statement 1**: Residents and businesses in Stehekin are concerned about the proposed solid waste fee structure. The new rate structure should be carefully developed and refined with substantial input from the community.

**Response:**

*Scope of the Environmental Assessment*

Sections 1.1.3 and 1.1.4 of the *Replacement of Administrative Facilities at Stehekin Environmental Assessment* (EA) outline the decisions to be made associated with this EA process and the decisions that are beyond the scope of this EA. Relative to solid waste management, the decision in this EA focuses on what specific facilities would be constructed, where they would be located, and how to improve overall solid waste management in Stehekin. The National Park Service (NPS) must promulgate a special regulation to allow NPS to legally site a new solid waste facility on NPS land and to collect non-NPS generated solid waste. The rulemaking process is a separate process that requires approvals and public review independent from this EA (see section 1.3.2.2), as described in more detail below. This EA analyzes the potential environmental and socioeconomic effects of the proposed rule as a cumulative action (see section 3.1.3.9) in order to satisfy the administrative procedures for promulgating a regulation, which include disclosure of environmental effects in accordance with the National Environmental Policy Act. Implementation of a solid waste fee is not part of the proposed rule. However, the proposed rule will bring the NPS into compliance with solid waste regulations, thereby allowing the NPS to establish a fee structure for solid waste service. Therefore, implementation of a solid waste fee is part of all alternatives evaluated in the EA. The solid waste fees presented in the EA are estimations only for purposes of disclosing potential environmental and economic effects.

*Solid Waste Disposal Fees as Presented in the Environmental Assessment*

The proposed solid waste fee structure described in the EA is conceptual and subject to change prior to implementation. The fee structure was selected during a Value Analysis – Choosing by Advantages Workshop held in 2014. The fee structure was developed in accordance with Director's Order (DO) 35B, Cost Recovery for NPS Provided Utilities, which provides specific policies and procedures for recovering costs associated with providing utility services, including solid waste and recycling services, to non-NPS users (see Section 1.3.2.1 of the EA). Implementation guidelines for DO 35B provide direction on determining costs and rate structures, recovering costs, phasing implementation of a cost recovery system, and requesting a waiver to all or part of the

implementation requirements when utility rates are extraordinarily high. An overview of the proposed solid waste fee structure was distributed at the public meetings during the EA public review period and is available on the NPS planning website: http://parkplanning.nps.gov/noca. This overview provides a conceptual unit rate and fixed fee breakdown by customer category (residential vs. commercial, year-round vs. seasonal, etc.). The final rate structure would be determined upon completion of the rulemaking process, as described further below.

The conceptual rate evaluated in the EA is based upon 2013 operations and maintenance (O&M) total cost and tonnage at the existing solid waste facility. A breakdown of these costs is provided in the "Proposed Solid Waste Fee Structure Overview" on the NPS planning website (see Table 2): http://parkplanning.nps.gov/noca. As directed in DO 35B, the unit rate would fluctuate annually based upon tracking the previous year's O&M cost and tonnage. DO 35B also specifies complete cost recovery when providing utility services. In addition to O&M costs, this means that cost recovery must also include capital investment costs to non-NPS users, such as the construction of a new solid waste facility. The new fee structure would be designed to recover capital investment over the estimated design life of the new facility through an amortization process. The EA estimates that the weight-based unit rate at the new solid waste facility would be 21% higher than the estimated rate at the existing facility. In accordance with phased implementation guidelines associated with DO 35B, any annual rate increase is capped at 10 percent per year, resulting in a phased rate increase over multiple years (see section 2.3.1.1 of the EA).

In response to comments received during the EA public review period, the NPS will consider eliminating the fixed fee component of the overall fee structure and will submit a request to waive part of the implementation requirements of DO 35B on behalf of all non-NPS users. As justification for the waiver request, the NPS may submit a financial analysis proposing to remove the cost of the recycling program from the overall solid waste cost recovery rate calculation, which would reduce the weight-based unit rate for trash by 15-20 percent. The NPS is also considering submitting a request to fully waive the project portion – i.e. the capital improvement cost – of significant equipment upgrades and new facility construction. This would eliminate the 21 percent projected increase in solid waste fees associated with cost recovery for all EA action alternatives, including the selected or preferred alternative. A waiver request may be granted only by the NPS Associate Director for Park Planning, Facilities, and Lands in consultation with the park Superintendent, Regional Director, and Associate Director for Business Services. The possibility of NPS pursuing a waiver request on behalf of all non-NPS users will be discussed during public meetings associated with the rulemaking process and planning for fee implementation. Actual unit rates will be determined based upon a variety of factors that are subject to change, including the previous year's O&M costs, total cost for construction of a new solid waste facility, phased implementation of fees, approval of a waiver to any of the implementation requirements of DO 35B, and the final fee structure, which will be determined following completion of the rulemaking process.

*Rulemaking Process and Planning for Fee Implementation*

A proposed rule/special regulation concerning solid waste disposal within Lake Chelan National Recreation Area (NRA) was prepared in coordination with the NPS Regulations Program Manager. Notice of the proposed rule was published in the Federal Register on July 13, 2015. This publication initiated a 90-day public comment period.

The NPS will hold public meetings during the comment period to discuss both direct and indirect impacts of the proposed rule. While this special regulation will authorize an NPS transfer station within Lake Chelan NRA, it does not supersede or replace other requirements applicable to solid waste disposal sites, including the requirement that NPS recover the cost of utilities provided to non-NPS users, in accordance with DO 35B. Implementation of a solid waste fee is not part of the proposed rule. However, the proposed rule will bring the NPS into compliance with solid waste

regulations, thereby allowing the NPS to initiate compliance with agency policy by establishing a fee structure for solid waste service. While both the proposed rule and implementation of fees will be discussed at these public meetings, only the transfer station authorizations would be implemented through publication of the rule. NPS implementation of a solid waste fee will occur on a separate but related timeframe as shown in the schedule below.

Following the public comment period, after all substantive comments and necessary changes have been incorporated, a final rule will be re-circulated for surname and signature. The final rule must be published in the Federal Register, and will take effect 30 days after publication.

Once the rule goes into effect and NPS has legal authority to accept solid waste from non-NPS entities (i.e. private residents and businesses), the NPS will take action to begin cost recovery and select an appropriate rate structure, as articulated in DO 35B. Ultimately, the rate structure that is adopted must be as equitable as possible to all users. In addition to holding public workshops associated with the proposed rule, the NPS anticipates scheduling subsequent public meetings in coordination with Chelan County to discuss development and implementation of the solid waste cost management plan. Based upon specific concerns raised during the EA public comment period, discussion topics at the public meetings may include the following:

- Facility Operation
- Efficiency Improvements
- DO 35B Waiver Request
- Rate Structure
- Customer Categories
- Operating Hours
- Invoice and Billing Mechanism
- Enforcement

A preliminary schedule of the rulemaking process and planning for fee implementation follows:

| | Date | Rulemaking Process | Planning for Fee Implementation |
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| 2015 | July | NPS submits proposed rule to Federal Register | |
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| | November | Final rule re-circulated for surname & signature | |
| | December | | Additional public workshops held in coordination with Chelan County |
| | December | Final Rule published In Federal Register | NPS submits waiver request on behalf of all non-NPS users |
| 2016 | January | Final rule goes into effect | NPS notifies users of proposed rates and logistics |
| | February | | |
| | March | | |
| | April | | New solid waste rates go into effect |

Clarifying information regarding the rulemaking process and planning for fee implementation as summarized above was added in the errata to the EA to section 3.1.3.9.

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**Concern Statement 2**: Alternative sites should not have been eliminated because they are eligible for land exchange.

**Response**: The NPS conducted a site selection and alternatives analysis process for the Selected Alternative in compliance with the Lake Chelan National Recreation Area Land Protection Plan. The protection of land exchange properties was a concern raised by the public during the public scoping process. As such, the NPS has made efforts to avoid properties being preserved for potential land exchange.

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**Concern Statement 3**: NPS should consider changes in alternatives or elements of the proposed alternatives to achieve the proposed objectives. Suggested changes include the layout and design of the proposed facilities, minimizing the footprint of the proposed facilities, use of the sand and gravel pit, and specific suggestions for solid waste management. New alternatives include improving the existing maintenance facility or upgrading equipment rather than constructing a new facility and siting the new maintenance facility at the Airstrip.

**Response:**

*Facility Design and Layout*

The design of the proposed facilities as shown in the EA is conceptual and subject to change. The layout and configuration of the new facilities would be determined during the final design process. As stated in section 2.3.2.1 of the EA, principles of sustainable design and high performance buildings would be incorporated into the planning, design, construction, business practices, and operation and maintenance of the new facilities. All new facilities would be designed to meet Leadership in Energy and Environmental Design (LEED) standards and would have architectural components that mimic the local vernacular. The new maintenance facility would also be designed to meet all appropriate Washington State Department of Transportation (WSDOT) and Federal Aviation Administration setback requirements due to its location adjacent to the Stehekin Airstrip. As indicated in the errata to the EA, Figures 5, 6, 7, 8, 9, and 10 have been updated to illustrate that the new maintenance facility and housing site would not be surrounded by "New Paving," as shown in the EA. These areas would be a pervious surface such as compacted gravel.

*Solid Waste Management*

Section 2.3.6 of the EA (Alternatives Considered but Dismissed) summarizes why it is not feasible for a private business or outside entity to construct and operate a solid waste transfer station in Stehekin. 36 CFR Part 6, Solid Waste Disposal Sites in Units of the National Park System, applies to all lands and waters within the boundary of a NPS unit, whether federally or non-federally owned. Thus, any entity interested in operating a solid waste disposal facility, including a transfer station, would require a special regulation authorizing the acceptance of solid waste from non-NPS generators; and any entity opting to construct a new facility located within the boundaries of Lake Chelan NRA would be required to meet all of the establishment requirements and siting restrictions for new facilities imposed by 36 CFR Part 6.4. Not all of the site restrictions and criteria for siting a new facility are achievable given the geographic constraints of the valley, and virtually any selected site would require a special regulation describing site-specific exceptions. The NPS may pursue

agreements or contracts to allow another entity (e.g., Chelan County, private contractor) to operate an NPS-owned solid waste facility upon completion of the rulemaking process.

The operation and management of the new solid waste facility will be further discussed with the public during the separate rulemaking process (see the response to Concern Statement 1). Final decisions regarding facility operation and management will be made during the final design process. Based upon specific concerns raised during the EA public comment period, facility operation will be a discussion topic at the public workshops on fee implementation, including specific issues such as recycling, composting, maintaining the "Mall," managing bulk material, etc.

*Sand, Rock, and Gravel Use*

During construction of the new facilities, NPS will ensure that the construction contractor complies with the guidelines for the use of material from the Stehekin gravel pit as outlined in the Lake Chelan National Recreation Area: Sand, Rock and Gravel Plan (1995).

*New Alternative: Improving Existing Facilities*

The decision to move and replace the maintenance facility to a location adjacent to the Stehekin Airstrip outside of the Channel Migration Zone (CMZ) of the Stehekin River was made in the *1995 Lake Chelan National Recreation Area (NRA) General Management Plan*. The need to replace these facilities is discussed in section 1.1.2 of the EA, Need for the Action, and further clarification is provided in the errata to the EA. In addition to being located in the Stehekin River's CMZ and its 100-year and 500-year regulatory floodplain, the existing facilities are inefficient to operate. The existing solid waste facility requires labor-intensive process and material-intensive packaging. The existing buildings also lack adequate insulation and have single-pane windows. The cost of improving and continuing to operate and maintain existing facilities and infrastructure is also anticipated to be more expensive than the cost of constructing and operating/maintaining a new facility over its design lifespan. The alternative of improving existing facilities was added in the errata to the EA to section 2.3.6, Alternatives Considered but Dismissed.

The NPS is also seeking funding to upgrade equipment at the existing solid waste facility in order to improve operational efficiency. Equipment upgrades was added to the description of the No Action Alternative in the errata to the EA, section 2.3.1, No Action Alternative. This equipment would be transferred to the new solid waste facility if and when it is constructed.

*New Alternative: Airstrip Site*

The decision to move and replace the maintenance facility to a location adjacent to the Stehekin Airstrip was made in the *1995 Lake Chelan National Recreation Area (NRA) General Management Plan*. The Airstrip is maintained and operated by the WSDOT Aviation Division under a special-use permit from NPS. The Airstrip is used for emergencies and by Stehekin residents and visitors. Due to the vital safety and access role that it serves for the Stehekin community, the airstrip is not considered a viable site for the new maintenance facility. This alternative was added in the errata to the EA to section 2.3.6, Alternatives Considered but Dismissed.

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**Concern Statement 4**: The EA needs to more explicitly state the need for some of the proposed elements.

**Response**: The need for the proposed action, including relocation of the maintenance facility, solid waste facility, and employee housing, is described in section 1.1.2 of the EA. Additional detail and clarification regarding the need for new facilities was added in the errata to the EA.

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**Concern Statement 5**: The money budgeted for the proposed project should be reallocated to the reopening of Stehekin Valley Road.

**Response**: Funding has not been obtained for the Selected Alternative. Funding of the maintenance facility may occur independently or concurrently with funding for housing, or in phases. Funding of capital improvement projects occurs on an annual basis within the NPS and is based upon the need for an action and the availability of funds. The reallocation of funds to another action such as the reopening of Stehekin Valley Road is not a feasible option.

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**Concern Statement 6**: Evaluate, assess, and address the Environmental Justice component of the proposal.

**Response**: The following was added to the errata to the EA (section 1.5.2.10) to further clarify the dismissal of environmental justice as an impact topic:

Presidential Executive Order 12898, General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

Although the Stehekin community contains low-income populations, environmental justice was dismissed as an impact for the following reasons:

- The Park staff and planning team actively solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of the Selected Alternative would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income population.
- The human health or environmental impacts associated with implementation of the preferred alternative would not disproportionately affect any minority or low-income population or community.

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**Concern Statement 7**: The EA should consider additional impacts on park operations.

**Response**: Section 3.2.8 of the EA (Park Operations) refers to the need for law enforcement to accommodate potential increases in illegal dumping of trash due to fee implementation. The need for enforcement will be discussed in more detail during the rulemaking process scheduled to occur in 2015. The NPS plans to facilitate additional public meetings during the rulemaking process and workshops for implementation of the solid waste cost recovery process. Based upon specific concerns raised during the EA public comment period, enforcement will be a topic of discussion at both public meetings and workshops.

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**Concern Statement 8**: The proposed solid waste fee structure will have an adverse effect on Stehekin residents and businesses.

**Response**: The NPS must promulgate a special regulation to allow the NPS to legally site a new solid waste facility on NPS land and to collect non-NPS generated solid waste. The rulemaking process is a separate process that requires approvals and public review independent from this EA (see section 1.3.2.2). Implementation of a solid waste fee is not part of the rulemaking process; however, the proposed rule will bring the NPS into compliance with solid waste regulations, thereby allowing the NPS to establish a fee structure for solid waste service. Implementation of a solid waste fee is part of all alternatives evaluated in the EA. The solid waste fees presented in the EA are estimations only for purposes of disclosing potential environmental and economic effects.

The NPS will facilitate additional public involvement opportunities to acquire meaningful input from the community regarding the rulemaking process and planning for fee implementation. The proposed rule was published in the Federal Register on July 13, 2015, initiating a 90-day public comment period, including public meetings to be held on September 8 and 9, to discuss both direct and indirect impacts of the proposed rule. Following the public comment period, and after all substantive comments and necessary changes have been incorporated, a final rule will be published in the Federal Register, which will take effect 30 days after publication. Once the rule goes into effect and the NPS has legal authority to select an appropriate rate structure, the NPS will begin cost recovery, as articulated in DO 35B, Cost Recovery for NPS Provided Utilities. Ultimately, the rate structure that is adopted must be as equitable as possible to all users. The NPS anticipates facilitating additional public workshops in coordination with Chelan County to discuss development and implementation of the solid waste cost recovery process and new fee structure. Based upon specific concerns raised during the EA public comment period, the proposed rate structure will be a topic of discussion at the public meetings, including issues such as defining equitable and reasonable solid waste disposal fees.

Section 3.2.9 of the EA (Socioeconomics) analyzes the potential social and economic effects of the proposed solid waste fees on the Stehekin community. The impact analysis and conclusions presented in this section are based on a variety of quantitative estimates and conceptual data, such as the conceptual solid waste fee structure, the number of residents in Stehekin (75 year-round and 80 seasonal), the definition of a seasonal resident (four months per year), the per capita income for Stehekin residents ($27,882, which is based upon the 2008-2012 per capita income for the Stehekin Census County Division, including Holden Village), etc. The annual costs to local residents as presented in the EA are estimates only and are subject to change based upon total cost for construction of a new solid waste facility, the previous year's operations and maintenance costs, and the final fee structure. The EA concludes that implementation of the new solid waste fee, at both the existing and new solid waste facility, would result in a "minor adverse" impact on local residents. The errata to the EA clarifies that the impacts have been changed to "moderate adverse." The annual cost per resident in the EA is based upon the estimated number of Stehekin residents, which includes children. Actual costs, however, will depend upon the actual quantity of garbage generated by each household, which was assumed to be proportional to the number of individuals within each household. As such, the potential reduction in discretionary income, which was estimated at approximately 1%, could be much greater for households with large families, resulting in greater economic impacts.

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**Concern Statement 9**: The potential spread of invasive species and tree removal associated with the proposed action is concerning.

**Response**: In compliance with Executive Order 13112, Invasive Species, the NPS must consider its actions relating to the spread of invasive species and take mitigating actions. As stated in section 2.5.3 of the EA, the NPS would utilize a variety of Integrated Pest Management measures to prevent the spread of

noxious, non-invasive plants during both construction and operation of the new facilities. As also noted in section 2.5.3 of the EA, the proposed facilities are located in existing clearings to minimize vegetation impacts. The NPS will locate the new facilities at the time of construction of the Selected Alternative to minimize the removal of trees.

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**Concern Statement 10**: Locating the new maintenance facility in the Company Creek alluvial fan is a flooding and safety risk.

> **Response**: As indicated in section 3.2.7.5 of the EA, mudslides and debris flow have not been observed on the Company Creek alluvial fan. Flooding across the alluvial fan could pose a minor risk to the new maintenance facility and NPS staff. However, a number of mitigating actions would be implemented to reduce this risk (see section 3.2.7.5).

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**Concern Statement 11**: The Public Health and Safety section should consider the cumulative impacts of the Selected Alternative on emergency management staging.

> **Response**: The Selected Alternative would not affect emergency management staging at other state-maintained airstrips. The proximity of the new maintenance and fire facility to the Stehekin Airstrip is expected to improve emergency operations within the Stehekin Valley. The proposed improvements would not have any foreseeable impact on emergency management staging at other airstrips in the state of Washington.

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**Concern Statement 12**: The potential impacts on public use of the Stehekin Airstrip should be considered.

> **Response:** The Selected Alternative is not expected to affect public use of the Stehekin Airstrip. The Airstrip is maintained and operated under the authority of a Special Use Permit issued by the NPS to the WSDOT Aviation Division. The Airstrip exists primarily for emergency use with occasional recreational use by residents and visitors. The new maintenance facility would also be designed to meet all appropriate WSDOT and Federal Aviation Administration setback requirements. Therefore, public use of the airstrip would not be affected.